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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action – Former Plainwell Impoundment Monthly Report (January 2008)

Dear Mike:

Attached is the eleventh monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action (TCRA). This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Stephen Garbaciak Jr., P.E.

Principal Engineer/Vice President

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February 15, 2008

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B0064530.014

MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION – FORMER PLAINWELL IMPOUNDMENT

REPORT #11, JANUARY 2008

PREPARED BY ARCADIS FEBRUARY 15, 2008

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

SUBMITTED TO

MICHAEL RIBORDY, ON-SCENE COORDINATOR UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REPORT #11, JANUARY 2008

Significant Developments and Activities During the Period

- On January 2, the Kalamazoo River Study Group (KRSG) submitted a copy of the 33rd Weekly
 Construction Report for the Plainwell TCRA to the United States Environmental Protection Agency
 (USEPA) and the Michigan Department of Environmental Quality (MDEQ).
- On January 3, the KRSG submitted sediment confirmation sampling coordinate data to MDEQ.
 USEPA received the data in December.
- On January 4, the KRSG submitted removal area figures to MDEQ. USEPA received the figures in December.
- On January 7, the KRSG submitted to the Michigan Department of Natural Resources (MDNR)
 confirmation from USEPA and the United States Fish and Wildlife Service (USFWS) that because all
 trees for the 2008 construction season are scheduled to be removed by April 1, 2008, no extra
 precautions need to be taken to protect the endangered Indiana bat tree habitat. This confirmation
 was received from USEPA and USFWS in December.
- On January 8 and 30, the KRSG submitted copies of analytical data from TCRA sampling activities to USEPA.
- On January 9, the KRSG submitted photographs showing the condition of the water control structure after a heavy flow event to MDNR.
- On January 10, the KRSG submitted the Year End Discharge Report to MDEQ, as required by Part II,
 Section C, Paragraph 3 of the Substantive Requirements Document No. MIU990025.
- On January 11, the KRSG submitted information regarding laboratory quality assurance procedures to USEPA.
- On January 15, the KRSG submitted the tenth *Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA* for December 2007 to USEPA.
- On January 21, the KRSG submitted a copy of the 34th Weekly Construction Report for the Plainwell TCRA to USEPA and MDEQ.
- On January 22, USEPA and MDEQ confirmed that monthly reports should continue to be submitted electronically and that a hard copy of the document is not required.

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 On January 28, MDNR confirmed that the KRSG should transfer the three turbines removed from the Plainwell Dam powerhouse directly to the City of Plainwell.

Data Collected and Field Activities Conducted During the Period

- No work was performed during the week of January 1.
- During the week of January 7, the KRSG completed excavation of soil and sediment in the Phase 1 Cofferdam Area, and continued grading and placing stone on the west bank of the west channel adjacent to the Plainwell Dam. Two sediment confirmation samples (K55360 and K55361) were collected from the Phase 1 Cofferdam Area. Two surface water samples (K30693 and K30694) were collected from locations downstream and upstream, respectively, of the water control structure. Prior to discharge, wastewater samples W_SA3S_Influ_0017, W_SA3S_Influ_0018, W_SA3S_Influ_0019, W_SA3S_Influ_0020, W_SA3S_Influ_0021, and W_SA3S_Influ_0022 (influent port), W SA3S MidA 0016, W SA3S MidA 0017, W SA3S MidA 0018, W SA3S MidA 0019, W SA3S MidA 0020, and W SA3S MidA 0021 (midpoint port, right side), W SA3S MidB 0017, W_SA3S_MidB_0018, W_SA3S_MidB_0019, W_SA3S_MidB_0020, W_SA3S_MidB_0021, and W_SA3S_MidB_0022 (midpoint port, left side), W_SA3S_EffluA_0016, W_SA3S_EffluA_0017, W SA3S EffluA 0018, W SA3S EffluA 0019, W SA3S EffluA 0020, and W SA3S EffluA 0021, (effluent port, right side), W_SA3S_EffluB_0017, W_SA3S_EffluB_0018, W_SA3S_EffluB_0019, W SA3S EffluB 0020, W SA3S EffluB 0021, and W SA3S EffluB 0022 (effluent port, left side) were collected from the 25 gallon per minute (GPM) water treatment system located at Staging Area 3S. Duplicates of samples W_SA3S_EffluB_0017 (W_SA3S_Dup_0005) and W_SA3S_EffluA_0020 (W_SA3S_Dup_0006) were also collected. PCB wipe samples were collected from the three turbines from the old powerhouse located near the Plainwell Dam (Prop-1, Prop-2, and Prop-3) to confirm that the turbines had been properly decontaminated prior to removing them from the site. Table A summarizes the samples collected.
- During the week of January 14, the KRSG completed grading, backfilling, and placing stone on the west bank of the west channel adjacent to the Plainwell Dam. Prior to discharge, wastewater samples W_SA3S_Influ_0023, W_SA3S_Influ_0024, and W_SA3S_Influ_0025 (influent port), W_SA3S_MidA_0022, W_SA3S_MidA_0023, and W_SA3S_MidA_0024 (midpoint port, right side) W_SA3S_MidB_0023, W_SA3S_MidB_0024, and W_SA3S_MidB_0025 (midpoint port, left side), W_SA3S_EffluA_0022, W_SA3S_EffluA_0023, and W_SA3S_EffluA_0024 (effluent port, right side), W_SA3S_EffluB_0023, W_SA3S_EffluB_0024, and W_SA3S_EffluB_0025 (effluent port, left side) were collected from the 25 GPM water treatment system located at Staging Area 3S. A duplicate of sample W_SA3S_MidB_0025 (W_SA3S_Dup_0007) was also collected. A PCB wipe sample (VT-2) was collected from the vacuum truck used to transport water between Staging Areas to confirm that the equipment had been properly decontaminated prior to demobilization. Table A summarizes the samples collected.

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- During the week of January 21, the KRSG conducted site preparation activities (clearing and grubbing, installation of staging areas and access roads) near Staging Area 4N. Fifteen soil samples (K25753 through K25767) were collected from the access road connecting Miller Road to Staging Area 4N and submitted for PCB analysis. These samples were collected at a spacing of 200 feet. Table A summarizes the samples collected.
- During the week of January 28, the KRSG continued site preparation activities (clearing and grubbing, installation of staging areas and access roads) near Staging Area 4N.
- As of January 31, approximately 37,000 cubic yards of material has been excavated from Removal Areas 1, 2A and 2B, 3A and 3B, 4A and 4B, 5, 6A and 6B, 7, 8, the Phase 1 Cofferdam Area, Upland Areas 3A1, 3A2, 4A1 and 6B1, and Islands 1, 2, and 3.

Laboratory Data Received During the Period

- No laboratory data were received during the week of January 1.
- During the week of January 7, the KRSG received analytical data for sediment confirmation sample K55360, PCB wipe samples Prop-1, Prop-2, Prop-3, and wastewater samples W_SA3S_Influ_0017, W_SA3S_Influ_0018, W_SA3S_Influ_0019, W_SA3S_Influ_0020, W_SA3S_MidA_0016, W_SA3S_MidA_0017, W_SA3S_MidA_0018, W_SA3S_MidB_0019, W_SA3S_MidB_0020, W_SA3S_EffluA_0016, W_SA3S_EffluA_0017, W_SA3S_EffluA_0018, W_SA3S_EffluA_0018, W_SA3S_EffluA_0019, W_SA3S_EffluB_0019, W_SA3S_EffluB_0019, W_SA3S_EffluB_0019, W_SA3S_EffluB_0020, and W_SA3S_Dup_0005.
- During the week of January 14, the KRSG received analytical data for sediment confirmation sample K55361 and wastewater samples W_SA3S_Influ_0021, W_SA3S_Influ_0022, W_SA3S_Influ_0023, W_SA3S_Influ_0024, W_SA3S_MidA_0020, W_SA3S_MidA_0021, W_SA3S_MidA_0022, W_SA3S_MidB_0023, W_SA3S_MidB_0024, W_SA3S_MidB_0024, W_SA3S_EffluA_0020, W_SA3S_EffluA_0021, W_SA3S_EffluA_0022, W_SA3S_EffluA_0023, W_SA3S_EffluA_0021, W_SA3S_EffluB_0022, W_SA3S_EffluB_0023, W_SA3S_EffluB_0024, and W_SA3S_Dup_0006.
- During the week of January 21, the KRSG received analytical data for PCB wipe sample VT-2 and wastewater samples W_SA3S_Influ_0025, W_SA3S_MidA_0024, W_SA3S_MidB_0025, W_SA3S_EffluA_0024, W_SA3S_EffluB_0025, and W_SA3S_Dup_0007.
- No analytical data were received during the week of January 28.

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 The KRSG is awaiting analytical data for surface water samples K30693 and K30694 and soil samples K25753 through K25767.

Issues Encountered and Actions Taken

- Rising waters caused the turbidity curtain downstream of the water control structure to fail on January
 The curtain was repaired on January 9 prior to the start of work activities.
- On January 8, rising waters created the potential of water flow around the east side of the Phase 1
 Cofferdam and onto the peninsula situated to the east of the Cofferdam. Sand bags were immediately
 placed in this area to contain the potential flow and prevent erosion of the peninsula. The sand bags
 contained the water until the water level receded later in the week.

Developments Anticipated During the Next Reporting Period

- Throughout February, the KRSG is scheduled to continue site preparation activities (clearing and grubbing and installation of staging areas and access roads).
- The KRSG will continue to submit the Weekly Construction Reports for the Plainwell TCRA to USEPA and MDEQ in February. The reports will be prepared and submitted on a bi-weekly basis until removal activities resume in the spring of 2008.
- The KRSG will continue to submit copies of analytical data from TCRA sampling activities to USEPA in February.
- Throughout February, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to USEPA, as required by Paragraph 11 of the TCRA AOC.

<u>Table A — Summary of Samples Collected and Data Received in January 2008</u>

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action	
Sediment Confirmation Samples										
K55360	01/09/08			KAR Labs	Phase 1 Cofferdam Area, Grid 2	PCBs	< 0.33 mg/kg	5 mg/kg	None	
K55361	01/11/08	01/15/08	080141	KAR Labs	Phase 1 Cofferdam Area, Grid 1	PCBs	< 0.33 mg/kg	5 mg/kg	None	
Soil Samples										
K25753						PCBs	-	-	-	
K25754						PCBs	-	-	-	
K25755	l		NR			PCBs	-	-	-	
K25756						PCBs	-	-	-	
K25757						PCBs	-	-	-	
K25758		NR		KAR Labs	Samples collected every 200' from north-	PCBs	-	-	-	
K25759	01/22/08				to south along access road leading from	PCBs	-	-	-	
K25760	01/22/00	INIX			Miller Road to Staging Area 4N	PCBs	-	-	-	
K25761						PCBs	-	-	-	
K25762						PCBs	-	-	-	
K25763						PCBs	-	-	-	
K25764						PCBs	-	-	-	
K25765						PCBs	-	-	-	
K25767						PCBs	-	-	-	
					Surface Water Samples					
			NR		Downstream of the water control		-	-	None	
K30693					structure on the west side of the	PCBs				
	01/11/08	NR		TAL	peninsula					
	01/11/06	INK			100' Upstream of the water control					
K30694					structure on the east side of the	PCBs	-	-	None	
					peninsula					
					Wastewater Samples					
W_SA3S_Influ_0017		01/09/08	080058	58 KAR Labs	Staging Area 3S, Discharge 17, influent sample	PCBs	< 0.1 μg/L	-	-	
W_SA3S_MidA_0016					Staging Area 3S, Discharge 17, midpoint sample, right side	PCBs	< 0.1 μg/L	-	-	
W_SA3S_EffluA_0016	01/07/08				Staging Area 3S, Discharge 17, effluent sample, right side	PCBs, TSS	< 0.1 μg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = 24 mg/L, Action Limit = 45 mg/L	
W_SA3S_MidB_0017					Staging Area 3S, Discharge 17, midpoint sample, left side	PCBs	< 0.1 μg/L	-	-	
W_SA3S_EffluB_0017					Staging Area 3S, Discharge 17, effluent sample, left side	PCBs, TSS	< 0.1 μg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	
[W_SA3S_Dup_0005]						[PCBs]	[< 0.1 μg/L]	[Monthly Average of 2.6 x 10-5 µg/L]	[None]	

See Notes on Page 4.

<u>Table A — Summary of Samples Collected and Data Received in January 2008</u>

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA3S_Influ_0018		01/10/08	080076	KAR Labs	Staging Area 3S, Discharge 18, influent sample	PCBs	0.1 μg/L	-	-
W_SA3S_MidA_0017					Staging Area 3S, Discharge 18, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0017					Staging Area 3S, Discharge 18, effluent sample, right side	PCBs, TSS, P	< 0.1 μg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.06 mg/L, No Action Limit
W_SA3S_MidB_0018					Staging Area 3S, Discharge 18, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0018					Staging Area 3S, Discharge 18, effluent sample, left side	PCBs, TSS, P	< 0.1 μg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L; P=0.06 mg/L, No Action Limit
W_SA3S_Influ_0019		01/11/08	080099	KAR Labs	Staging Area 3S, Discharge 19, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0018					Staging Area 3S, Discharge 19, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0018	01/09/08				Staging Area 3S, Discharge 19, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0019					Staging Area 3S, Discharge 19, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0019					Staging Area 3S, Discharge 19, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0020	01/10/08	/08 01/11/08	080121	KAR Labs	Staging Area 3S, Discharge 20, influent sample	PCBs	0.1 μg/L	-	-
W_SA3S_MidA_0019					Staging Area 3S, Discharge 20, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0019					Staging Area 3S, Discharge 20, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0020					Staging Area 3S, Discharge 20, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0020					Staging Area 3S, Discharge 20, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 4.

<u>Table A — Summary of Samples Collected and Data Received in January 2008</u>

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action
Wastewater Samples (continued)									
W_SA3S_Influ_0021		01/15/08	080140	KAR Labs	Staging Area 3S, Discharge 21, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0020					Staging Area 3S, Discharge 21, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0020	01/11/00				Staging Area 3S, Discharge 21, effluent	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
[W_SA3S_Dup_0006]	01/11/06				sample, right side	[PCBs, TSS]	[< 0.1 µg/L]	[Monthly Average of 2.6 x 10-5 µg/L]	[None: TSS = <4 mg/L, Action Limit = 45 mg/L]
W_SA3S_MidB_0021					Staging Area 3S, Discharge 21, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0021					Staging Area 3S, Discharge 21, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0022		01/15/08	080140	KAR Labs	Staging Area 3S, Discharge 22, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0021					Staging Area 3S, Discharge 22, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0021	01/12/08				Staging Area 3S, Discharge 22, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0022					Staging Area 3S, Discharge 22, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0022					Staging Area 3S, Discharge 22, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_Influ_0023		5/08 01/17/08	080174	4 KAR Labs	Staging Area 3S, Discharge 23, influent sample	PCBs	< 0.1 µg/L	-	-
W_SA3S_MidA_0022	01/15/08				Staging Area 3S, Discharge 23, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluA_0022					Staging Area 3S, Discharge 23, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L
W_SA3S_MidB_0023					Staging Area 3S, Discharge 23, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-
W_SA3S_EffluB_0023					Staging Area 3S, Discharge 23, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L

See Notes on Page 4.

Table A — Summary of Samples Collected and Data Received in January 2008

Sample ID	Sample Date	Data Received	Sample Delivery Group	Laboratory	Sample Location	Analysis Conducted	PCB Result	PCB Action Limit	Response Action	
Wastewater Samples (continued)										
W_SA3S_Influ_0024		01/18/08	080191	KAR Labs	Staging Area 3S, Discharge 24, influent sample	PCBs	0.1 μg/L	-	-	
W_SA3S_MidA_0023					Staging Area 3S, Discharge 24, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-	
W_SA3S_EffluA_0023	01/16/08				Staging Area 3S, Discharge 24, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	
W_SA3S_MidB_0024					Staging Area 3S, Discharge 24, midpoint sample, left side	PCBs	< 0.1 µg/L	-	-	
W_SA3S_EffluB_0024					Staging Area 3S, Discharge 24, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 µg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	
W_SA3S_Influ_0025			080214	KAR Labs	Staging Area 3S, Discharge 25, influent sample	PCBs	0.5 μg/L	-	-	
W_SA3S_MidA_0024		01/21/08			Staging Area 3S, Discharge 25, midpoint sample, right side	PCBs	< 0.1 µg/L	-	-	
W_SA3S_EffluA_0024	01/17/08				Staging Area 3S, Discharge 25, effluent sample, right side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	
W_SA3S_MidB_0025					Staging Area 3S, Discharge 25, midpoint sample, left side	PCBs	0.1 μg/L	-	-	
[W_SA3S_Dup_0007]					mapoint sample, left side	[PCBs]	[0.1 µg/L]	[-]	[-]	
W_SA3S_EffluB_0025					Staging Area 3S, Discharge 25, effluent sample, left side	PCBs, TSS	< 0.1 µg/L	Monthly Average of 2.6 x 10-5 μg/L	None: TSS = <4 mg/L, Action Limit = 45 mg/L	
	PCB Wipe Samples									
Prop-1	01/09/08	01/10/08	080095	KAR Labs	Turbine 1 from old powerhouse	PCBs	0.6 μg/100 cm ²	10 μg/100 cm ^{2 1}	None	
Prop-2					Turbine 2 from old powerhouse	PCBs	< 0.1 μg/100 cm ²	10 μg/100 cm ^{2 1}	None	
Prop-3					Turbine 3 from old powerhouse	PCBs	0.1 μg/100 cm ²	10 μg/100 cm ^{2 1}	None	
VT-2	01/18/08	01/22/08	080235	KAR Labs	Interior of the vacuum truck used to move water between staging areas	PCBs	0.1 μg/100 cm ²	10 μg/100 cm ^{2 1}	None	

Notes

1 - The decontamination standard for non-porous materials previously in contact with PCB-containing liquid according to Federal Regulations (Title 40, Chapter 1, Subchapter R, Part 761.79.3)

 $\begin{array}{lll} cm^2 - square \ centimeters. & TSS - Total \ Suspended \ Solids. \\ NR - not \ received. & mg/kg - milligrams \ per \ kilogram. \\ P - Phosphorus. & mg/L - milligrams \ per \ liter. \\ PCB - Polychlorinated \ Biphenyls. & \mu g/L - micrograms \ per \ liter. \\ \end{array}$

TAL - TestAmerica Laboratories.

^{*} Duplicate samples are shown in brackets.

^{*} Analytical results have not been validated.